

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

COURTHOUSE NEWS SERVICE,

*Plaintiff,*

v.

JUDY K. RUPP, et al.,

*Defendants.*

Case No. 1:22-cv-00548-BAH

\* \* \* \* \*

**JOINT MOTION TO STAY PROCEEDINGS FOR 45 DAYS**

The parties jointly move this Honorable Court for an order staying the above-captioned proceeding for forty-five (45) days to allow the parties an opportunity to discuss settlement while their cross-motions for summary judgment are pending, and prior to the Court ruling on them. In support of their joint motion the parties state as follows:

1. On January 13, 2023, the parties participated in a settlement conference with Magistrate Judge Matthew J. Maddox, after which the parties continued to discuss settlement, but they did not reach a settlement at that time. (ECF No. 60).

2. The parties have completed discovery per the deadlines set forth in the Court's Amended Scheduling Order. (ECF No. 90).

3. The Parties have filed cross-motions for summary judgment, which are each fully-briefed and currently pending before the Court. (ECF Nos. 95-107).

4. Following the completion of briefing on the motions for summary judgment, the parties resumed settlement discussions. The parties are currently discussing settlement

and have made progress on key issues in this case.

5. The parties now respectfully request that the Court refrain from ruling on their pending cross-motions for summary judgment for a period of at least 45 days to allow them time to continue their settlement negotiations and, hopefully, resolve this matter without the need for further court proceedings or judicial action.

6. A brief 45-day stay is the interest of judicial economy and will not prejudice any party. All case deadlines have passed, with only the parties' cross-motions for summary judgment currently pending before the Court. (See ECF No. 76, 90).

7. The parties will either file a status report following the expiration of the 45-day period, or file documents sufficient to dispose of the case if they reach a final settlement, whichever might occur first.

For the foregoing reasons, the parties jointly and respectfully request that this Honorable Court enter an order temporarily staying the case for a period of 45-days, or until July 5, 2024.

	Respectfully submitted,
Bryan Cave Leighton Paisner LLP <u>/s/ Katherine Keating</u> Jonathan Fetterly, Esq. ( <i>admitted pro hac vice</i> ) Katherine Keating, Esq. ( <i>admitted pro hac vice</i> ) Three Embarcadero Center, 7 <sup>th</sup> Floor San Francisco, California 94111 Telephone: (415) 675-3400 Facsimile: (415) 675-3434 E-Mail: jon.fetterly@bclplaw.com E-Mail: katherine.keating@bclplaw.com	ANTHONY G. BROWN Attorney General of Maryland <u>/s/ Kevin M. Cox</u> KEVIN M. COX (29012) KATHRYN HUMMEL (21991) Assistant Attorney General 200 St. Paul Place, 20 <sup>th</sup> Floor Baltimore, Maryland 21202 (410) 576-6388 (telephone) (410) 576-6393 (facsimile) kcox@oag.state.md.us

	<p>khummel@oag.state.md.us</p> <p><i>Attorneys for Defendants</i></p>
<p><b>McNamee Hosea, P.A.</b></p> <p><u>/s/ James Tuomey</u> James Tuomey, Esq. (28395) John P. Lynch, Esq. (07433 888 Bestgate Road, Suite 402 Annapolis, Maryland 21401 Telephone: (410) 266-9909 Facsimile: (410) 266-8425 E-Mail: jtuomey@mhlawyers.com E-Mail: jlynch@mhlawyers.com</p> <p><i>Attorneys for Courthouse News Service</i></p>	